



**Public Comment Analysis**

Date: April 27, 2011

Topic: The Proposed Co-location of a New District 79 GED Plus Program (79Q950) with an Existing DOE School, Harlem Renaissance High School (05M285), in School Building M911

Date of Panel Vote: April 28, 2011

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**Summary of Proposal**

The New York City Department of Education (“DOE”) is proposing to co-locate a new District 79 GED Plus Program (79Q950, “GED Plus”) in school building M911 (“M911”) located at 22 East 128<sup>th</sup> Street, New York, NY 10035, within the geographical confines of Community School District 5 (“District 5”). District 79 provides diverse and innovative educational opportunities that combine rigorous academic instruction with meaningful youth development. District 79 has developed programs and partnerships that strive to ensure secondary and post-secondary success for even the most struggling students. The proposed GED Plus program intends to offer full-time day classes for students who are 18-21 years old and who need extensive academic support to prepare for the GED examination. The GED Plus program would also offer a wide array of wraparound services, including career training, counseling and internships. The GED Plus program would have an on-going open enrollment, meaning that eligible students would be admitted on a first-come, first-served basis depending on seat availability throughout the school year.

If approved, the proposed GED Plus program would be co-located in building M911 with Harlem Renaissance High School (05M285, “Harlem Renaissance”), an existing transfer high school. Transfer schools are small, academically rigorous high schools designed to re-engage students who have fallen behind in high school or are at risk of dropping out. Transfer schools enroll over-age, under-credited students and therefore do not adhere to strict grade distinctions. Students typically enroll at various stages in terms of credit accumulation or Regents pass rates as they progress toward graduation. Harlem Renaissance currently serves approximately 216 students in grades nine through twelve. It has a rolling admissions policy, accepting students who are 16 years of age and older and who have attended high school for at least one year and have fewer than 8 academic credits.

Building M911 also provides space to three community-based organizations (“CBOs”): Hunter College Liberty Partnership Program, Street Corner Resources and New York City Mission Society. New York City Mission Society is the CBO partner for Harlem Renaissance under the Learning To Work (“LTW”) Initiative. Building M911 also offers free childcare and support

services for student parents through the Living for the Young Family through Education (“LYFE”) Center. A “co-location” means that two or more school organizations are located in the same building and may share common spaces like auditoriums, libraries, gymnasiums, and cafeterias.

In 2009-2010, building M911 had a capacity to serve 280 students, and the building enrolled 221 students, yielding a target building utilization rate of 79%. In 2010-2011, building M911 has an enrollment of 216 students, which yields an estimated building utilization rate of 77% of target capacity. This means that the building is “under-utilized” and has extra space to accommodate additional students.

The details of this proposal have been released on an Educational Impact Statement (“EIS”) posted on March 4, 2011 on the DOE’s Website at <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2010-2011/Apr282011Proposals>. Copies of the EIS are also available in the Harlem Renaissance High School’s main office.

### **Summary of Comments Received at the Joint Public Hearing**

A joint public hearing regarding this proposal was held at M911 on April 5, 2011. At the hearing, interested parties had an opportunity to provide input on the proposal. Approximately 12 members of the public attended the hearing and 4 people spoke. Present at the meeting were: Manhattan High Schools Superintendent Geraldine Taylor-Brown; Harlem Renaissance Principal Nadav Zeimer; Harlem Renaissance’s School Leadership Team (“SLT”) representatives Earl Gray, Lenore Hinson, and Elenora Demetrio; Harlem Renaissance Parent-Teacher Association President Milton Brown; District Family Advocate for District 5 Denise Gordon; GED Plus program Principal and the Senior Advisor to District 79 Robert Zweig; Community Education Council (“CEC”) 5 representative Niannette Jackson; and Safiya A. Raheem from the Office of Council Member Inez E. Dickens.

#### **The following comments and remarks were made at the Joint Public Hearing:**

1. CEC 5 representative Niannette Jackson stated that:
  - a. She supports the proposal and that she is excited about the creation of a new program that offers extra help to students, and invited the audience to come out to the CEC 5’s monthly meeting.
  - b. Furthermore, she read a statement from the CEC 5 stating that CEC 5 is supportive of public schools. More resources are needed in public schools and the answer is not to bring in more charter schools, but to provide more resources to the public schools.
2. Harlem Renaissance’s SLT representative Earl Gray asserted that:
  - a. The addition of the GED Plus program in the building would present a challenge to Harlem Renaissance. He mentioned that Harlem Renaissance has applied for or is currently in the process of applying for various new initiatives and programs, which would be negatively affected by the sharing of resources.
  - b. He also noted his concern regarding safety at the school.

3. Principal of the GED Plus program and the Senior Advisor to District 79 Robert Zweig expressed his excitement regarding potential partnerships with Harlem Renaissance and stated that this program would provide another opportunity for the students in the community. He mentioned that he is committed to ensuring that the GED Plus program completely integrates into the building and the community. He looks forward to having more conversations with the Harlem Renaissance community to work out the details of the co-location. He also noted that if the proposal were to be approved, his program would be open to sharing resources with Harlem Renaissance and promoting safety in the building.
4. Safiya A. Raheem from the Office of Council Member Inez E. Dickens read a statement that said:
  - a. While Council Member Dickens supports the proposal, she urges the DOE to delay the co-location until the beginning of the 2012-2013 school year.
  - b. Combining two programs in a shared space takes time and proper planning.
5. A commenter inquired if the GED Plus program that would come into the building already has a cohort of students that need to be re-sited. She also noted that if there weren't already existing students that needed to be moved, then they shouldn't rush to open the program in the building, but rather spend some time to properly plan the program.
6. Milton Brown, PTA President at Harlem Renaissance, asked the following questions that arose from a meeting with the parents:
  - a. What impact will this have on the current students in the building?
  - b. Has a co-location like this one occurred in other areas? If so, what was the outcome of the co-location?
  - c. Would there be enough security in the building to ensure safety if the proposal were approved?
7. A commenter asked where the students for the GED Plus program would come from and how many would enroll in September. She also asked how many of the students in the program enrolled in college.
8. Denise Gordon, District Family Advocate for District 5, noted that:
  - a. The parent coordinator from Harlem Renaissance has done a great job.
  - b. She would lend her support to the GED Plus program if approved.
9. Nadav Zeimer, Principal at Harlem Renaissance, stated that:
  - a. He shares Bob Zweig's vision and is excited to bring the GED Plus program into the Harlem Renaissance community.
  - b. However, he expressed his concern that Harlem Renaissance is in the process of initiating new programs that may be negatively impacted by the GED Plus program and asked for the delay in the process so that there can be more time for planning.

#### **Summary of Issues Raised in Written and/or Oral Comments Submitted to the DOE**

10. Council Member Inez Dickens submitted a statement, which was read during the Joint Public Hearing and is described in comment 4 above.

**Analysis of Issues Raised, Significant Alternatives Proposed  
and Changes Made to the Proposal**

Comments 1(a), 3, 8(b) and 9(a) are in support of this proposal and therefore do not require a response.

Comments 1(b) and 8(a) are unrelated to this proposal and therefore do not require a response.

In response to comments 2(a) and 6(a), the co-location of the GED Plus program in building M911 will not adversely impact Harlem Renaissance students. This proposal is not anticipated to impact the admissions process, instructional and extracurricular offerings, and partnerships of Harlem Renaissance. Harlem Renaissance will continue to serve its students and develop new programs as it has in the past.

With regard to comments 2(b) and 6(c) concerning safety in building M911: The DOE recognizes that safety may be a concern among parents, students and staff in building M911 next year if the co-location proposal is approved. The DOE notes that Harlem Renaissance staff work arduously to ensure that students feel safe in the building. The DOE is fully committed to continue to work closely with Harlem Renaissance staff and the GED Plus program staff to provide safety and security in the building for all students.

Pursuant to Chancellor's Regulation A-414, every school/campus must have a School Safety Committee. The committee plays an essential role in the establishment of safety procedures, the communication of expectations and responsibilities of students and staff, and the design of prevention and intervention strategies and programs specific to the needs of the school. The committee is comprised of various members of the school community, including Principal(s); designee of all other programs operating within the building; United Federation of Teachers ("UFT") Chapter Leader; Custodial Engineer/designee; and In-house School Safety Agent Level III. The committee is responsible for addressing safety matters on an ongoing basis and making appropriate recommendations to the Principal(s) when it identifies the need for additional security measures, intervention, training, etc.

Consistent with the process described above, the leader/designee of the GED Plus program will be part of the M911 building School Safety Committee. As a member of the School Safety Committee, the leader/designee of the GED Plus program will participate in the development of the building's Safety Plan and ensure that any security related issues or needs which may arise with respect to the co-location of the GED Plus program will be addressed on an ongoing basis. Moreover, the Safety Plan for the M911 school building will be modified as appropriate to meet any changing security needs associated with the co-location. The GED Plus program will enter information in the M911 school building's overall Safety Plan to ensure the safe operation of the school building.

Each school building must also establish a Building Response Team that will consist of trained staff members from each of the campus' schools and programs, and which is activated when emergencies or large building-wide events occur. The members of this team must be identified and listed in the School Safety Plan.

The completed Safety Plan for the M911 school building will be submitted to the Borough Safety Directors of the Office of School and Youth Development (“OSYD”) for approval. If changes or modifications are necessary, the School Safety Committee will be advised. Once the School’s Safety Plan is approved, it will be submitted to the NYPD for final approval and certification by the NYPD.

The Office of School and Youth Development supports schools in maintaining a safe, orderly and supportive school environment. OSYD works directly with Children’s First Network Safety Liaisons and schools to establish and implement integrated safety, discipline and intervention policies and procedures, to promote respect for diversity, and to nurture students' pro-social behavior by providing them with meaningful opportunities for social-emotional learning. We encourage all schools to seek support from OSYD to address any issues involving safety and security, including gang related issues.

Furthermore, school safety agents are allocated to schools based on each building’s projected enrollment. As the enrollment at building M911 increases in 2011-2012, the number of safety agents at the school will be adjusted accordingly. The NYPD School Safety Division looks at a set of variables to determine the number of safety agents to deploy to a particular school building, including the crime rate, size and design of the building, enrollment, and grade span.

With regard to comments 4(a), 4(b), 5, 9(b) and 10, the DOE believes that co-locating a new GED Plus program in building M911 beginning in 2011-2012 will expand the options for future eligible District 79 students in upper Manhattan and throughout New York City. There is high demand for GED programs throughout the City and especially in Manhattan and the Bronx. The co-location of a GED Plus program in building M911 will create a much needed high quality educational option for students who are 18-21 years old and who wish to earn a high school equivalency or GED diploma.

In response to comments 5 and 7, the GED Plus program would enroll approximately 60-75 new students, if approved. The GED Plus program would have an on-going open enrollment, meaning that eligible students would be admitted on a first-come, first-served basis depending on seat availability throughout the year. To enroll, interested students who are 18-21 years old must visit the Manhattan Referral Center for an intake interview located at 269 West 35<sup>th</sup> Street, Manhattan, NY 10018.

With regard to comment 6(b): District 79 was established to help students who need additional supports to succeed in their current school or require alternative pathways to attain a high school or GED diploma. District 79 provides students with diverse and innovative educational opportunities that combine rigorous academic instruction with meaningful youth development. District 79 currently operates 55 sites across New York City that offer GED programs, including 20 sites housed in DOE buildings. The Jeffrey C. Tenzer GED Plus program, for instance, is successfully co-located with Cascades High School, an existing transfer school, Satellite Academy High School at Forsyth Street, an existing transfer school, and a LYFE Center, a District 79 program that offers free childcare and support services to help student parents stay on track to graduation, in school building M510 located at 198 Forsyth Street, Manhattan, NY 10002.

With regard to comment 7: In line with broader DOE efforts to collect data on college readiness and enrollment among high school students City-wide, District 79 is also developing new metrics to gather data on college readiness and enrollment for students enrolled in GED programs.

**Changes Made to the Proposal**

No changes have been made to this proposal as a result of the public comments received.